

NATIONAL ASSOCIATION OF STATE FORESTERS

444 North Capitol Street, NW, Washington, DC 20001 (202) 624-5415 FAX (202) 624-5407

1996

**Executive
Committee**

January 11, 1996

President
Stanley F. Hamilton
Idaho

Federal Communications Commission (FCC)
1919 M Street, NW
Washington, D.C. 20554

RECEIVED

JAN 16 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Vice President
Paul D. Frey
Louisiana

RE: PR Docket 92-235

To Whom It May Concern:

DOCKET FILE COPY ORIGINAL

Treasurer
Marvin D. Brown
Missouri

*Northeastern
Representative*
Ronald G. Abraham
Ohio

Understanding that the deadline for comments on the above docket was January 5, 1996, the National Association of State Foresters and International Association of Fish and Wildlife Agencies tried to messenger our enclosed comments to the FCC on January 5. The messenger returned with our comments saying they were not accepted because the FCC was on furlough. Weather conditions have prohibited our office from being open till today. I hope under the circumstances these comments will be accepted and reviewed.

*Western
Representative*
Larry A. Ketchman
North Dakota

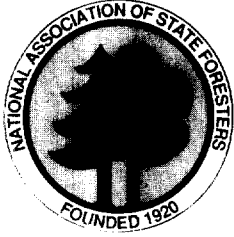
Sincerely,

Terri Bates
Executive Director

*Southern
Representative*
James L. Sledge, Jr.
Mississippi

*Immediate
Past President*
William A. Farris
Iowa

Executive Director
Terri Bates



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In the Matter of:

Replacement of Part 90 by Part 88
to Revise the Private Land Mobile Radio Services
and Modify the Policies Governing Them
and
Examination of Exclusivity and Frequency
Assignment Policies of the Private Land Mobile
Radio Services

PR Docket 92-235

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Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

To The Commission:

This is to convey the views of the National Association of State Foresters (NASF) pertaining to the Federal Communications Commission's Further Notice of Proposed Rulemaking in the above-captioned proceeding.

The National Association of State Foresters (NASF) represents the directors of the state forestry agencies from the fifty states, territories and District of Columbia. State Forester responsibilities include the protection and management of over seventy percent of the nation's forests. State Forestry personnel are the first emergency response for forest fire suppression and they are also highly involved in responding to other natural disasters. Forestry conservation radio communications systems that are well designed, interference free, available and coordinated are essential need to fulfilling their mission in the protection of life and property. The majority of Forestry Conservation systems are inter-tied with local police and fire radio systems providing for maximum efficiency during emergencies.

NASF strongly supports the position of the Forestry Conservation Communication Association which is being separately submitted and urges that the existing Public Safety Radio Services remain separate for now and that any proposal to consolidate be delayed until the Public Safety Wireless Advisory Committee ("PSWAC") findings are completed. NASF believes consolidation at this point is premature and would likely create serious radio interference problems if the FCC forced this complicated issue. In addition, the PSWAC findings may be counter to consolidation making a decision to pool channels a poor one.

Should the FCC nevertheless proceed with service consolidation, NASF recommends keeping the current Part 90, Subpart B, Public Safety Radio Services within the same service pool. NASF strongly opposes the consolidation plan proposed by UTC, which would separate the Forestry Conservation Radio Service from the Police, Fire, and Emergency Medical Radio Services. The principal use of Forestry Conservation Radio service channels is for fire fighting and basic law enforcement activities on public lands. The users of those channels are firefighters, forest rangers, game wardens and others who have

direct responsibility for the protection of life and property. They should not be given "second class" status in any service consolidation that may occur.

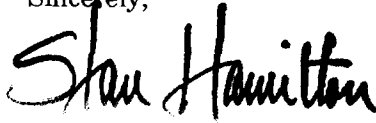
The existing frequency coordination system through the Forestry Conservation Communications Association (FCCA), has worked well for 30 years, and is supported by the Public Safety Communications Council ("PSCC"). The FCCA has been very effective in solving interference problems at the coordinator level. Interservice sharing problems have largely been solved in the PSCC. NASF is extremely concerned with changing frequency coordination in forestry-conservation by mandate without going through a comprehensive and facilitated process .

Good radio systems require radio channels that have been skillfully coordinated. NASF believes that coordinations made from a pool without regard to wide-area application, by coordinators operating without common standards and unfamiliar with forestry conservation, and by an organization born out of forced consolidation are a recipe for trouble. Finally, NASF is an advocate for good radio channel coordination's that better serve our men and women serving on the ground in our forests and natural resource areas.

NASF is deeply concerned that the FCC persists in pressing for consolidation in spite of requests by public safety associations and the PSCC to delay. Forced consolidation at this time when resources are extremely constrained ensures unnecessary problems and complications.

For the reasons stated above, NASF opposes radio service consolidation at this time.

Sincerely,

A handwritten signature in black ink that reads "Stan Hamilton". The signature is written in a cursive, flowing style.

Stanley F. Hamilton, Idaho State Forester
President, National Association of
State Foresters